

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

In re:

Case No.: 20-30663

The Roman Catholic Diocese of Syracuse,
New York,

Chapter 11

Debtor.

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Lauren R. Lifland of Wilmer Cutler Pickering Hale and Dorr LLP, hereby enters her appearance, pursuant to section 1109(b) of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), on behalf of Continental Insurance Company as successor by merger to the Fireman’s Insurance Company of Newark, New Jersey, Glenn Falls Insurance Company, and Fidelity & Casualty Company of New York; Continental Casualty Company; and National Fire Insurance Company of Hartford (collectively, “Continental”), and, pursuant to Rules 2002, 9007, and 9010 of the Bankruptcy Rules and section 1109(b) of the Bankruptcy Code, requests that all notices given or required to be given in the above-captioned case be served upon:

Lauren R. Lifland
**WILMER CUTLER PICKERING
HALE AND DORR LLP**
7 World Trade Center
250 Greenwich Street
New York, New York 10007
Telephone: (212) 295-6305
lauren.lifland@wilmerhale.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand is not only for the notices and papers referred to in the sections of the Bankruptcy Code and the Bankruptcy Rules specified above, but also includes, without limitation, any and all orders and notices of any

application, motion, petition, complaint, demand, request or other pleading in this case, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronically or otherwise filed with or delivered to the Bankruptcy Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001), which affects the Debtor, or property of the Debtor or proceeds thereof, or Continental.

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PLEASE TAKE FURTHER NOTICE that this request shall not be deemed or construed to be a waiver of any substantive or procedural rights of Continental, including, without limitation:

(i) the right to challenge the jurisdiction of this Court to adjudicate any matter, including, without limitation, any non-core matter; (ii) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the Northern District of New York (the “District Court”); (iii) the right to have a trial by jury in any proceeding related to this case or any case, controversy or proceedings related to this case; (iv) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; and (v) any other rights, claims, actions or defenses to which Continental may be entitled in law, in equity or otherwise, all of which rights, claims, actions and defenses are expressly reserved.

Dated: March 23, 2021

/s/ Lauren R. Lifland

Lauren R. Lifland
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Counsel for Continental Insurance Company as successor by merger to the Fireman’s Insurance Company of Newark, New Jersey, Glenn Falls Insurance Company, and Fidelity & Casualty Company of New York; Continental Casualty Company; and National Fire Insurance Company of Hartford